

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	4:22 CR 3077
)	
vs.)	
)	
NEIL SURESH CHANDRAN,)	
)	
Defendant)	
)	

**GOVERNMENT’S MOTION FOR ALTERNATIVE VICTIM NOTIFICATION
UNDER 18 U.S.C. § 3771(d)(2)**

The United States, through undersigned counsel, respectfully moves this Court, pursuant to 18 U.S.C. § 3771(d)(2), for authorization to use alternative victim notification procedures—namely, publication on a Department of Justice website—because the large number of potential crime victims in this case makes it impracticable to notify them on an individualized basis. In support of its motion, the Government states the following:

1. The Crime Victims’ Rights Act (“CVRA”), 18 U.S.C. § 3771, provides crime victims with certain rights, including the right to “reasonable, accurate, and timely notice” of public court proceedings. 18 U.S.C. § 3771(a). A “crime victim” is defined as “a person directly or proximately harmed as a result of the commission of a Federal offense” 18 U.S.C. § 3771(e). In cases involving “multiple crime victims” where the court “finds that the number of crime victims makes it impracticable to accord all of the crime victims the rights described in [18 U.S.C. § 3771](a), the Court shall fashion a reasonable procedure to give effect to this chapter that does not unduly complicate or prolong the proceedings.” 18 U.S.C. § 3771(d)(2).

2. The Government respectfully submits that this case involves “multiple crime victims” under 18 U.S.C. § 3771(d)(2) because of the number of potential crime victims. As this

Court is aware, Defendant Neil Suresh Chandran is alleged to have committed investment fraud from 2018 to the present, and through the fraudulent scheme, has raised over \$45 million from more than 10,000 investors. The victims are located throughout the United States and abroad.

3. Given the number of potential crime victims, this case involves “multiple crime victims” under 18 U.S.C. § 3771(d)(2) because it is impracticable for the Government to, among other things, identify and provide individualized notice to each potential crime victim pursuant to 18 U.S.C. § 3771(a).

4. As an alternative procedure to notify potential crime victims in this case, the Government proposes that it maintain a public Department of Justice website at <https://www.justice.gov/criminal-vns/case/united-states-v-neil-chandran>. The website would provide a summary of the case, information regarding the case’s status, and other significant case-related documents, such as the charging documents and plea agreement. The website also would contain an e-mail address and telephone number for a Victim Assistance Line through which individual potential crime victims could contact the Department of Justice with questions regarding the case.

5. Courts in this District and others have authorized the use of a website by the Government to notify crime victims under the CVRA in other complex fraud cases that involved numerous potential victims. See *United States v. Voight*, No. 4:18CR3143, 2018 WL 5832044, at *1 (D. Neb. Nov. 7, 2018); *United States v. Zhao*, 1:18-cr-24, ECF No. 53 (N.D. Ill. Jan. 23, 2019); *United States v. Mohan*, 4:18-cr-610, ECF No. 29 (S.D. Tex. Dec. 14, 2018); *United States v. Gandhi*, 4:18-cr-609, ECF No. 33 (S.D. Tex. Dec. 4, 2018); *United States v. Edmonds*, No. 18-cr-239 (RNC), ECF No. 16 (D. Conn. Nov. 19, 2018).

6. WHEREFORE, the Government respectfully requests that, under 18 U.S.C. § 3771(d)(2), the Court authorize the Government to maintain a website as a reasonable alternative procedure for notifying crime victims in this case.

DATED this 6th day of July, 2022.

Respectfully Submitted,

LORINDA I. LARYEA
ACTING CHIEF
U.S. DEPARTMENT OF JUSTICE
CRIMINAL DIVISION, FRAUD SECTION

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CERTIFICATE OF SERVICE

I hereby certify that on July 6, 2022, I electronically filed the foregoing with the Clerk of the Court of the United States District Court for the District of Nebraska by using the CM/ECF system.

/s/ Tian Huang
TIAN HUANG